

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

JOHN STUART,

Defendant.

21-CR-07-LJV-JJM

NOTICE OF MOTION

MOTION BY:

Jeffrey T. Bagley, Assistant Federal Public
Defender

DATE, TIME & PLACE:

Before the Honorable Jeremiah J. McCarthy, United
States Magistrate Court Judge, Robert H. Jackson
United States Courthouse, 2 Niagara Square,
Buffalo, New York, **on the papers submitted.**

SUPPORTING PAPERS:

Affirmation of Assistant Federal Public Defender
Jeffrey T. Bagley, dated February 15, 2023

RELIEF REQUESTED:

One-week extension of time to file submissions as
to remaining issues.

DATED:

Buffalo, New York, February 15, 2023.

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley
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Counsel for Defendant John Stuart

TO: David J. Rudroff
Assistant United States Attorney

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AFFIRMATION

JEFFREY T. BAGLEY, affirms under penalty of perjury that:

1. I am an Assistant Federal Public Defender for the Western District of New York and I represent the defendant, John Stuart, in the instant matter.

2. After oral argument held on January 15, 2023, this Court set a deadline for the defendant to review any new materials and file submissions as to remaining issues by February 22, 2023. Dkt # 74.

3. I respectfully request a one-week extension of this date, as I will be out of the district.

4. The government has no objection to this request, and time remains excluded because of the pending motion.

WHEREFORE, it is respectfully requested that the defense's response date be extended by one week.

DATED: Buffalo, New York, February 15, 2023

Respectfully submitted,

/s/ Jeffrey T. Bagley

Jeffrey T. Bagley

Assistant Federal Public Defender

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